

ROCKWELL LIME COMPANY

4110 Rockwood Rd., Manitowoc, WI 54220-9619 • 920-682-7771 • 1-800-558-7711 • Fax: 920-682-7972

Certified Mail/Return Receipt Requested

January 23, 2004

Constantinos Loukeris
AE-17J
Air and Radiation Division
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

RECEIVED

JAN 29 2004

**AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5**

RE Rockwell Lime Company
 Manitowoc, WI
 Notice of Violation – November 25, 2003 (EPA-5-04-WI-03)
 Enforcement Conference – January 14, 2004

Dear Mr Loukeris

At the enforcement conference held in your offices on January 14, 2004 with respect to the Notice of Violation (NOV) issued by EPA to Rockwell Lime Company (RLC) on November 25, 2003, we were asked when RLC began burning petroleum coke as a solid fuel in Kiln #2

Review of our records confirms that we began using petroleum coke in Kiln #2 in 1981.

In the process of our record review we identified three pieces of correspondence which may be useful to this discussion. Attached please find the following.

1. November 7, 1989 Notice of Violation from EPA to RLC relating to use of petroleum coke in a fuel blend with a sulfur content in excess of 2 1% (Attachment 1).
2. January 5, 1990 letter from outside counsel for RLC to the Wisconsin Department of Natural Resources (WDNR) summarizing the enforcement conference EPA and RLC held on December 12, 1989 (Attachment 2).
3. January 11, 1990 letter from EPA to RLC summarizing the enforcement conference held on December 12, 1989 EPA's letter concluded that RLC had stopped using noncompliant fuel

and was in compliance with the permit limit, and required RLC to conduct fuel sampling for six months to confirm that conclusion (Attachment 3)

Coupled with the attachments to the letter dated January 13, 2004 which we hand-delivered during the enforcement conference on January 14 and the December 20, 1994 letter from WDNR to EPA which we provided separately during the enforcement conference (Attachment 4 for ease of reference), this correspondence demonstrates the following history:

1. In 1989 EPA issued RLC an NOV for use of a solid fuel blend which contained petroleum coke and which had a sulfur content in excess of 2.1%. It appears EPA may have had two concerns: that RLC was using a solid fuel blend of both petroleum coke and coal, rather than just coal, and that the sulfur content of the petroleum coke sometimes exceeded 2.1%. (Attachment 1)

2. In response, RLC limited its solid fuel blend to a sulfur content of 2.1%. EPA concluded RLC was in compliance with the permit requirement so long as the sulfur content of the solid fuel blend remained below 2.1%. EPA recognized that RLC used a blend of solid fuels and required RLC to conduct monthly fuel sampling for a period of 6 months to substantiate that the solid fuel blend continued to be compliant (Attachments 2 and 3)

3. RLC continued to limit its solid fuel blend to a sulfur content of 2.1% from 1990-1995.

4. In December 1994, WDNR sought EPA's concurrence in a revision to RLC's permit to establish a formula to demonstrate compliance with the 2.1% sulfur content limit on the fuels burned in Kiln #2. That letter stated that "the proposed permit establishes Best Available Control Technology (BACT) to be the use of fuel blend (natural gas, coal, coke) having a sulfur content of 2.1% as determined on a 24-hour average" and proposed a formula which would require RLC to limit the sulfur input to Kiln #2 to 147 pounds of sulfur per hour averaged over a 24-hour period. (Attachment 4)

4. In 1995, RLC's permit was revised to incorporate the formula set out in the 1994 letter from WDNR to EPA (RLC's 1995 Permit). As issued by WDNR and approved by EPA, RLC's 1995 Permit recognized RLC's fuel blend may at any given time consist of natural gas, coal, petroleum coke and/or a petroleum coke/coal blend. RLC's 1995 Permit established that compliance with BACT is demonstrated by sulfur input to the kiln which does not exceed 147 pounds of sulfur per hour averaged over a 24-hour period as computed using the formula established in the permit. RLC's 2003 Permit contains the same requirement (see Attachments A and B to our January 13 letter).

5. The monthly fuel usage reports attached to our January 13 letter as Attachment C demonstrate that RLC has been in continuous compliance with the limitation of 147 pounds of sulfur per hour averaged over a 24-hour period

We believe this should resolve any further concerns EPA may have about the sulfur content of RLC's fuel blend and the company's compliance with the terms of its past and current permits and enable EPA to withdraw the NOV issued to RLC on November 25, 2003.

Thank you very much.

Sincerely,

ROCKWELL LIME COMPANY

A handwritten signature in black ink, appearing to read 'Don Brisch', with a large, stylized flourish at the end.

Donald R. Brisch
President

Attachments 1, 2, 3 and 4

Cc. William Bauman, WDNR
Rick Wulk, WDNR
L.H. Bochert, Michael Best & Friedrich
T.W. Bolland, T. W. Bolland & Associates

ATTACHMENT #1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF

NOV 7 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph Brisch
Executive Vice-President
Rockwell Lime Company
4223 Rockwood Road
Rockwood, Wisconsin 54220

RECEIVED

JAN 29 2004

AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5

Re: Notice of Violation
Rockwell Lime Company
Kiln #2
Rockwood, Wisconsin

Dear Mr. Brisch:

The enclosed Notice of Violation is issued this date pursuant to Section 113(a)(1) of the Clean Air Act (Act), as amended, 42 U.S.C. Section 7413(a)(1), to notify Rockwell Lime Company that the Administrator of the United States Environmental Protection Agency (U.S. EPA) finds Rockwell Lime Company located in Rockwood, Wisconsin, in violation of the applicable Federal Prevention of Significant Deterioration of Air Quality Regulations found at 40 C.F.R. §52.21.

Section 113 of the Clean Air Act provides U.S. EPA with several enforcement options. Those options include the issuance of an administrative order or the commencement of a civil or criminal action. In addition, Section 120 provides for assessment and collection of noncompliance penalties, and Section 306 of the Act, 42 U.S.C. 7606, as implemented by Executive Order 11738 and 40 C.F.R. §15, provides that facilities in noncompliance with the Act may become ineligible for Federal contracts, grants or loans.

We are offering you an opportunity for a conference to discuss the violations that are the subject of this Notice. The conference will afford you an opportunity to present information bearing on the finding of violation, on the nature of the violation, on any efforts you have taken to achieve compliance, and on the steps you propose to take.

The U.S. EPA contact in this matter is Ms. Shirley Mitchell. Please contact Ms. Mitchell, at (312) 353-2086, to request a conference. Such a request should be made as soon as possible but in any event no later than ten (10) days after receipt of this Notice. Any conference must be held within thirty (30) days of your receipt of this Notice.

Sincerely yours,

David F. Kee, Jr.

David Kee, Director
Air and Radiation Division (5AC-26)

Enclosure

cc: Donald F. Theiler, Director
Bureau of Air Management
Wisconsin Department of Natural Resources

Mike DeBrock, Director
Lake Michigan District Headquarters
Wisconsin Department of Natural Resources

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

Rockwell Lime Company
Rockwood, Wisconsin

)
)
) Notice of Violation
) EPA-5-90-A-6
)
)

Proceeding Pursuant to
Sections 113 and 167 of the
Clean Air Act, as amended,
42 U.S.C. §§7413 and 7477

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)
)
)
)

NOTICE OF VIOLATION

Pursuant to Section 113(a)(1) of the Clean Air Act ("the Act"), 42 U.S.C. §7413(a)(1), you are hereby notified that the Administrator of the United States Environmental Protection Agency ("U.S. EPA"), by authority duly delegated to the undersigned, finds that Rockwell Lime Company is in violation of Part C, Title 1, of the Act--Prevention of Significant Deterioration of Air Quality and the Wisconsin State Implementation Plan ("SIP").

REGULATORY BACKGROUND

1. On June 19, 1978, the Administrator of U.S. EPA promulgated regulations establishing procedures for preventing significant deterioration of air quality ("PSD regulations"), 40 C.F.R. §52.21. The provisions of 40 C.F.R. §§52.21(b) through (w) have been incorporated into the Wisconsin SIP. 40 C.F.R. §§52.21(a) and 52.2581(b).
2. Any owner or operator who operates a source in violation of any term of a permit to construct issued under the PSD regulations is subject to enforcement action. 40 C.F.R. §52.21(r).

SPECIFIC FINDING OF VIOLATION

3. Rockwell Lime Company owns and operates a rotary lime kiln (kiln No. 2) at its lime production plant located at 4223 Rockwood Road, Rockwood, Wisconsin.
4. The kiln No. 2 is a major stationary source of sulfur dioxide, as defined at 40 C.F.R. §52.21(b)(1)(i)(a).
5. On September 27, 1979, U.S. EPA, Region V, issued a construction permit to Rockwell Lime Company pursuant to the regulatory requirements for Prevention of Significant Deterioration, for the construction of rotary lime kiln No. 2. **The permit to construct** limits the sulfur content of the coal used to fire the kiln to 2.1 percent, on a 24-hour basis.

6. Rockwell Lime Company has been utilizing petroleum coke as fuel for the kiln No. 2. Analysis of the petroleum coke samples taken on June 29, 1988, July 12, 1988 and November 12, 1988, documented sulfur contents of 4.24 percent, 4.31 percent and 4.05 percent respectively, well exceeding the limit set by the construction permit.
7. Rockwell Lime Company is operating the kiln No. 2 in violation of its permit to construct issued under the PSD regulations and in violation of the Wisconsin SIP.

Date: NOV 7 1989

David F. Kertcher, for
David Kee, Director
Air and Radiation Division (5AC-26)

ATTACHMENT #2

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202 4497
414/277 5000
FAX 414/277 5591

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

Quarles & Brady

January 5, 1990

Mr. Donald F. Theiler
Director, Bureau of Air Management
Wisconsin DNR
P.O. Box 7921
Madison WI 53701-7921

Re: Rockwell Lime Company
Rockwood, Wisconsin

Dear Mr. Theiler:

This letter will provide you with a status report regarding the November 7, 1989 Notice of Violation issued by U.S. EPA Region V to Rockwell Lime Company. EPA's notice alleged violation of a condition contained in a PSD permit issued to the Company in 1979 for the construction and operation of a rotary lime kiln (kiln no. 2). The subject condition imposes a 2.1% sulfur content limitation on fuel used to fire the kiln.

On December 12, 1989, an enforcement conference was held at EPA's offices in Chicago concerning this matter. The Company informed EPA that it is in compliance with the terms and conditions of the permit by utilizing a blend of fuel to fire rotary kiln no. 2 which meets the 2.1% sulfur content limitation. The Company has been utilizing the compliance fuel blend since August of 1989, when the Company was first informed by telephone by EPA of the alleged permit violation.

At the December 12 meeting in Chicago, the Company also provided EPA with information responsive to EPA's Request for Information dated November 20, 1989. We are enclosing herewith copies of the documents which were provided to EPA. This information responds to Items 2 and 3 of EPA's Request for Information. On December 12, EPA indicated that the Company will not be required to perform the stack test requested in Item 1 of EPA's November 20, 1989 letter.

At the conclusion of the December 12 meeting, EPA indicated that it would consider the information presented to it at the meeting. EPA stated that it was pleased with the prompt action taken by the Company to achieve compliance in this matter. It is likely that EPA will require sampling of the fuel utilized in kiln no. 2 on a routine basis and notification to EPA and DNR anytime there is a change in the fuel supplier. EPA indicated

Mr. Donald F. Theiler
January 5, 1990
Page 2

that the Company is now in compliance with the permit limitations and that no further enforcement action would be taken. The Company expects to receive a letter from EPA confirming the above position in the near future.

Please feel free to contact us if you have any questions or comments concerning this matter.

Very truly yours,

QUARLES & BRADY



Michael S. McCauley

225:lr

Enclosures

cc: Mr. Donald R. Brisch
Vice President of Operations
Rockwell Lime Company
Mr. Mike DeBrock
DNR - Green Bay



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF.

JAN 16 1990

Joseph G. Brisch
Executive Vice-President
Rockwell Lime Company
4223 Rockwood Road
Manitowoc, Wisconsin 54220-9619

Re: Rockwood Plant
Lime Kiln No. 2

Dear Mr. Brisch:

On November 20, 1989, the United States Environmental Protection Agency (U.S. EPA) sent a letter requesting that you provide certain information and conduct a stack test to determine the sulfur dioxide emission rate for lime kiln No. 2. On December 12, 1989, representatives of your Company met with my staff in regard to the Notice of Violation that was issued to Rockwell Lime Company on November 7, 1989. At the meeting, U.S. EPA was presented with information indicating that Rockwell Lime Company has stopped using noncompliant fuel for lime kiln No. 2, and currently is in compliance with the limit specified by its Permit to Construct. Therefore, U.S. EPA has determined that it is not necessary for you to perform the stack test at this time. However, to substantiate that Rockwell Lime Company will continue to use compliant fuel, you are hereby required, under the authority of Section 114 of the Clean Air Act (a copy of which is enclosed), to perform fuel sampling and analysis, and to provide such information to U.S. EPA in the manner indicated below:

- 1) Within 30 days of receipt of this letter, and continuing for 6 months thereafter, Rockwell Lime Company shall conduct monthly fuel sampling and analysis on each type of solid fuel used at lime kiln No. 2. Sampling and analysis shall be performed on an as fired basis and in accordance with ASTM, Part 26.
- 2) Within 60 days of receipt of this letter, and continuing for 6 months thereafter, Rockwell Lime Company shall submit monthly reports to U.S. EPA documenting the results of the sampling and analysis requested above. Additionally, each report shall include the following information:
 - a) Date sample taken.
 - b) Date sample analyzed.
 - c) Identification of the person(s) or laboratory conducting the tests.
 - d) Type of each fuel burned for the month.
 - e) Amount of each fuel burned for the month.

- f) Source and supplier of each fuel.
- g) Date and amount of usage for any fuel containing more than 2.1 percent sulfur by weight on an as fired basis, and the amount and sulfur content of other fuels used on the same day.

The information required by this letter shall be submitted to Mr. Larry F. Kertcher, Chief, Air Compliance Branch, Region V, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604. A copy of the information reply should also be sent to Mr. Donald F. Theiler, Director, Bureau of Air Management, Wisconsin Department of Natural Resources, 101 S. Webster Street, P.O. Box 7921, Madison, Wisconsin 53707.

Please be advised that U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

Pursuant to regulations appearing at 40 CFR Section 2.100 et seq., (41 F.R. 36902), you are entitled to assert a business confidentiality claim covering any portion of the submitted information which is not emission data or necessary to determine emission data. Failure to assert such a claim makes the submitted information available to the public without further notice. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulations.

Any questions concerning this request may be directed to Mr. Farro Assadi, of my staff, who may be contacted at (312) 353-2086.

Your cooperation in providing this information is appreciated.

Sincerely yours,



David Kee, Director
Air and Radiation Division (5AC-26)

Enclosure

cc: Donald F. Theiler, Director
Bureau of Air Management

standard boc's: official file copy w/attachment(s)
 originator's copy w/attachment(s)
 originating organization reading file w/attachment(s)

other boc's:

SARD:ACB:SECTION II:ASSADI/mg:01/08/90
Saved: A:lrrlc.fa



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897
AIR MGMT FAX 608-267-0560

George E. Meyer
Secretary

December 20, 1994

ATTACHMENT #4

File Code: 4560
FID #: 436034390

Mr. Gary Gulezian
Chief, Air & Radiation Branch
U.S. EPA, Region V
77 West Jackson Blvd
Chicago, IL 60604

SUBJECT: Rockwell Lime Company
Revision of Federal PSD Permit No. EPA-5-79.

Dear Mr. Gulezian:

The Department is in the process of revising the federal PSD permit for kiln No. 2 for Rockwell Lime Company. On January 18, 1994, the Department mailed to U.S. EPA, Region V copies of the Department's preliminary determination which included the draft permit for comments.

Rockwell Lime Company received federal and state construction permits for kiln No. 2 in 1978 and 1979. Both permits specify that the maximum sulfur content of the fuel(s) burned in the kiln be 2.1 percent on a 24-hour average. The state permit allows this limit to be met by burning a mix of fuels (gas, coal and petroleum coke). The federal permit however, specified that this limit applies only to coal.

At present time, Rockwell Lime Company is burning a blend of these three fuels in the kiln No. 2. A letter was sent by U.S. EPA (Mr. Dave Kee) to Rockwell Lime Company (Mr. Joe Brisch) on January 1, 1990. Copy of this letter was attached with the preliminary determination. Based on this letter Rockwell Lime Company is considered to be in compliance with the 2.1% fuel sulfur content via fuel blending. Because the federal permit differs from the state permit, Rockwell Lime Company is interested in resolving this difference so that the federal permit is consistent with the state permit. This will assure that Rockwell Lime Company will be allowed to continue burning the fuel blend of gas, coal, and petroleum coke in demonstrating compliance with 2.1 percent sulfur limit.

The proposed draft permit establishes BACT to be the use of fuel blend (natural gas, coal, coke) having a sulfur content of 2.1% as determined on a 24-hour average.

Rockwell Lime Company has indicated in their comments that they would like to demonstrate compliance with the BACT emission limits using a formulae. This formulae is included as part of attachment 1. Rockwell Lime Company will keep records on a daily basis of the amount and sulfur content of the fuels used. This information will be used in showing the compliance with the sulfur limit on a daily basis.

TABLE 1

*** ROCKWELL LIME CO - ROCKWOOD ***
 *** SO2 SOURCE DATA ***

STACK NUMBER	EMISSION RATE (LBS/HR)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	HEIGHT (METERS)	TEMP TYPE=0 (DEG.K)	EXIT VEL TYPE=0 (M/SEC)	DIAMETER TYPE=0 (METERS)	BLDG. HEIGHT TYPE=0 (METERS)	BLDG HORIZ DIMEN (METERS)
1	481.25	0.0	0.0	0.0	23.5	533	12.4	1.80	17.10	15.2

TABLE 2

SULFUR DIOXIDE 3-HR HIGH

<u>YEAR</u>	<u>MONTH</u>	<u>DAY</u>	<u>EASTING (M)</u>	<u>NORTHING (M)</u>	<u>CONCENTRATION (UG/M³)</u>
1983	NOV	27	-200	-100	844
1984	APR	21	-200	-100	813
1985	DEC	01	100	-200	799
1986	NOV	14	100	200	771
1987	APR	02	100	-200	674

SULFUR DIOXIDE 24-HR HIGH

<u>YEAR</u>	<u>MONTH</u>	<u>DAY</u>	<u>EASTING (M)</u>	<u>NORTHING (M)</u>	<u>CONCENTRATION (UG/M³)</u>
1983	NOV	24	200	50	300
1984	MAR	21	100	-200	250
1985	MAY	12	200	200	221
1986	DEC	03	200	0 0	286
1987	FEB	08	100	-200	275

SULFUR DIOXIDE ANNUAL HIGH

<u>YEAR</u>	<u>EASTING (M)</u>	<u>NORTHING (M)</u>	<u>CONCENTRATION (UG/M³)</u>
1983	-100	-100	13.2
1984	100	200	14.2
1985	100	200	11.2
1986	100	200	11.1
1987	-100	-100	11.1

4. Regional background concentrations were calculated and found to be as follows:

Background Concentrations

Monitoring Site	Pollutant	Time Period	Concentration ($\mu\text{g}/\text{m}^3$)
Wilson Township Sheboygan	SO_2	3-hr	197.5
		24-hr	41.2
		Annual	9.3

5. A receptor grid of 49 receptors was used in the analysis. The grid was centered on the lime kiln with receptors having 100 meter spacing. Terrain was not considered in this analysis.

D. Model Results

Results show that the sulfur dioxide concentration is below its respective standards.

Pollutant/Time Period	SO_2 /3-hr	SO_2 /24-hr	SO_2 /Annual
Source impact ($\mu\text{g}/\text{m}^3$)	844	300	14.2
Background ($\mu\text{g}/\text{m}^3$)	197.5	41.2	9.3
Total ($\mu\text{g}/\text{m}^3$)	1042	341	24
Air Quality Std. ($\mu\text{g}/\text{m}^3$)	1300	365	80
% of standard	80%	93%	30%

E. Conclusion

The results of the modeling analysis demonstrate that if the kiln emitted SO_2 at the maximum allowable rate of 5.5 lbs per million BTU, the standards for sulfur dioxide will not be exceeded.

cc: Ralph Patterson - AM/7

DATE: December 16, 1994

File Code: 4530
FID #: 436034390

TO: Raj Vakharia - AM/7

FROM: John Meier - AM/7 Jm

SUBJECT: Air Dispersion Analysis for Permit Alteration of Rockwell Lime Co - Rockwood

A. Introduction

A modeling analysis was completed by John Meier on 16 December 1994. This analysis assessed the sulfur dioxide impacts of a lime kiln at Rockwell Lime Company. The maximum allowable limit for the kiln is 5.5 lbs of sulfur dioxide per million BTU. At this limit, the kiln would emit 481.25 lbs/hour of sulfur dioxide. This air quality analysis was performed to ensure that the three-hour sulfur dioxide standard would still be protected at the maximum allowable if the permit is altered. The facility would like to fire the kiln with coal, coke, and natural gas. Rockwell Lime Company is located near the Town of Rockwood in Manitowoc County. Terrain was not considered in this analysis. The Prevention of Significant Deterioration (PSD) baseline has been set for sulfur dioxide in Manitowoc County as of February, 1979, however this alteration will not result in any increment being consumed as total emissions will not be increased. The Town of Rockwood is in attainment for all criteria pollutants except for ozone. Manitowoc County is a moderate nonattainment area for ozone.

B. Modeling Analysis

1. Raj Vakharia supplied the emission parameters used in this analysis. Building dimensions were taken from plot plan provided by the facility. Please refer to the attached source table.
2. Five years (1983-1987) of Green Bay preprocessed meteorological data was used in this analysis. Both the surface and upper air meteorological data originated in Green Bay.
3. The Industrial Source Complex Short Term 2 (ISCST2) model was used in the analysis. The model used rural dispersion coefficients. The regulatory default option was activated in the model which allows for calm correction, buoyancy induced dispersion, and building downwash.

$$\frac{(F_{NG} \times S_{NG}) + (F_C \times S_C) + (F_{PC} \times S_{PC}) + (F_B \times S_B)}{}$$

147.0 #S / LY

F_{NG} = Amount of Natural Gas Used (CF)

S_{NG} = Lbs of Sulfur/CF

F_C = Amount of Coal Used (Lbs)

S_C = % Sulfur - Coal

F_{PC} = Amount of Petroleum Coke Used (Lbs)

S_{PC} = % Sulfur - Petroleum Coke

F_B = Amount of Coal/Pet. Coke Blend Used (Lbs)

S_B = % Sulfur - Coal/Coke Blend

MAX. PRODUCTION: TONS/DAY 300
MMBTU/TON 7.0

	Totals	Coal	Nat. Gas
CURRENT PERMIT LIMITATIONS			
BTU/# or CF		12500	1000
% SULFUR or #/CF		2.1%	2.9E-05
# of S/MMBTU		1.68	0.029
% USAGE		100.0%	0.0%
FUEL RATE (# or CF/Hr)		7,000	0
# S/HR	147.00	147.00	0.00
MMBTU/HR	87.50	87.50	0.00
# of S/MMBTU	1.68		

	Totals	Coal	Coke	Nat. Gas
CURRENT COAL-COKE-GAS BLEND				
BTU/# or CF		13000	14000	1000
% SULFUR or #/CF		1.0%	4.2%	2.9E-05
# of S/MMBTU		0.77	3.00	0.029
% USAGE		65.5%	30.0%	4.5%
FUEL RATE (# or CF/Hr)		4,409	1,875	3,938
COAL/COKE BLEND		70%	30%	
# S/HR	122.95	44.09	78.75	0.11
MMBTU/HR	87.50	57.31	26.25	3.94
# of S/MMBTU	1.41			

	Totals	Coal	Coke	Nat. Gas
POSSIBLE FUTURE BLEND				
BTU/# or CF		13000	14000	1000
% SULFUR or #/CF		1.0%	4.2%	2.9E-05
# of S/MMBTU		0.77	3.00	0.029
% USAGE		60%	54.0%	40.0%
FUEL RATE (# or CF/Hr)		404	3,375	35,000
COAL/COKE BLEND		11%	89%	
# S/HR	146.80	4.04	141.75	1.02
MMBTU/HR	87.50	5.25	47.25	35.00
# of S/MMBTU	1.68			

The Department has had several phone discussion with the EPA Region V staff (Mr. Constatine Blatharas) regarding the use of the equation to show compliance with the SO₂ BACT emission limit. One concern brought to our attention was for the need to establish in the permit revision a maximum allowable SO₂ emission limit on a 3-hour basis. This was to ensure that the three hour sulfur dioxide ambient air quality standard would be protected.

Kiln No. 2 is also subject to SO₂ emission limit of 5.5 pounds of sulfur dioxide per million BTU heat input when firing solid fuel per sec. NR 417.07(2)(b), Wis. Adm. Code. At this limit, the kiln would emit 481.25 pounds per hour of SO₂. An air quality modeling analysis was performed at an allowable emission rate to ensure that the three-hour SO₂ ambient air quality standard would still be protected at the maximum allowable limit of 5.5 pounds of sulfur dioxide per million BTU heat input. A copy of the modeling analysis is also included as attachment 2 for your information.

The Department would like to know if EPA would have any concerns if an equation is established in the permit to show compliance with the SO₂ BACT limit of 2.1% sulfur as determined on a 24-hour average. Also the permit will limit them to maximum allowable of 5.5 pounds of sulfur dioxide per million BTU heat input averaged over 3 hour period. This is to ensure that the three-hour SO₂ ambient air quality standard will still be protected.

Currently the facility keeps records of the amount of fuel fired and the sulfur content on an hourly and daily basis. Rockwell lime will continue to keep records to show compliance with both the emission limits which may be established in the permit.

Please provide your comments on the proposed 3 hour emission limits or on the equation for demonstrating compliance with the BACT emission limits at your earliest convenient. Rockwell lime Company is anxious to get the permit as soon as possible. Should you have any questions on this request, please call Raj Vakharia at 608-267-2015.

Sincerely,



Daniel Johnston, Supervisor
New Source Unit
Permit Section

cc: ~~Don Brisch, Rockwell Lime Company~~
Robert Miller, U.S. EPA Region V
Constatine Blatharas, U.S. EPA Region V
Mike DeBrock, LMD
Raj Vakharia, AM/7

Enclosure